

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

**Lasheena Sipp-Lipscomb and Andres
Gardin, Sr., Individually and in their own
right and as Parents and Natural
Guardians of A G, Jr., a Minor**

v.

**Einstein Physicians Pennypack Pediatrics,
*et al.***

Civil Action No. 2:20-cv-01926-MMB

ORDER

AND NOW, this ____ day of _____, 2022, upon consideration of Plaintiffs' Motion for Extension of Time to Respond to the Motions in Limine at ECF 223, 224, 225 and 226, and any response thereto, it is hereby ORDERED and DECREED that the Motion is GRANTED. Plaintiffs shall file responses no later than December 22, 2022.

BY THE COURT:

MICHAEL M. BAYLSON, J.

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**PLAINTIFFS' MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTIONS IN LIMINE
AT ECF 223, 224, 225 and 226**

Plaintiffs, by and through their undersigned counsel, hereby move this Court to extend the deadlines to file Responses to Motions in Limine at ECF 223, 224, 225 and 226, and in support thereof avers as follows:

1. On December 1, 2022, Defendants Charles Concodora, M.D. and Urology for Children filed a Motion in Limine to Preclude Any Testimony, Argument and Evidence Regarding Money Owed to Urology for Children by St. Christopher's Hospital (ECF 223).
2. On December 1, 2022, the St. Christopher's Defendants filed three Motions in Limine: 1) Motion in Limine to Preclude Any Reference to EMTALA (ECF 224); 2) Motion in Limine to Preclude Plaintiffs from Offering Speculative Damages Evidence (ECF 225); and 3) Motion in Limine to Preclude Any Reference that Radiology Technician Ms. Bartkus was Engaged in the Unauthorized Practice of Medicine (ECF 226).
3. Due to a family medical emergency, as well as outstanding professional commitments in other cases, Plaintiffs' counsel will be unable to file his Responses

to the four (4) Motions in Limine by the deadline of December 8, 2022, and is respectfully requesting a two-week extension until December 22, 2022.

4. Plaintiffs' counsel has consulted with all of defense counsel, and no Defendants oppose the requested relief.

WHEREFORE, Plaintiffs' counsel respectfully requests that this Court extend Plaintiffs' Response deadline until December 22, 2022.

JOKELSON LAW GROUP, P.C.

Date: December 6, 2022

By: s/David E. Jokelson

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, DAVID E. JOKELSON, hereby certify that on December 6, 2022, a true and correct copy of the *Plaintiffs' Motion for Extension of Time to Respond to the Motions in Limine at ECF 223, 224, 225 and 226*, was served *via* the Court's ECF System upon the following:

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